

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SECURITIES AND EXCHANGE)
COMMISSION,)
)
Plaintiff,)
)
v.)
)
BINANCE HOLDINGS LIMITED,)
BAM TRADING SERVICES INC.,)
BAM MANAGEMENT US HOLDINGS)
INC., AND CHANGPENG ZHAO,)
)
Defendants.)

No. 1:23-cv-01599-ABJ-ZMF

**JOINT MOTION FOR A PROTECTIVE ORDER
CONCERNING CONFIDENTIAL INFORMATION PRODUCED PURSUANT TO THE
CONSENT ORDER**

Plaintiff Securities and Exchange Commission (“SEC”), Defendant Binance Holdings Limited, Defendant BAM Trading Services Inc., Defendant BAM Management US Holdings Inc., and Defendant Changpeng Zhao (collectively, the “Parties”), through undersigned counsel jointly move for the entry a protective order to govern the treatment and disclosure of certain confidential information produced pursuant to the June 17, 2023 Consent Order (Dkt. No. 71) (hereafter the “Consent Order”). The proposed protective order accompanies this motion.

Documents and other information to be produced pursuant to the Consent Order may contain confidential or other nonpublic information as specified in the proposed protective order. The Parties have agreed to a proposed protective order that limits how such information will be protected and disclosed during the course of this litigation. The parties further propose that any Protective Order entered in connection with this motion will be superseded by any Order entered by Judge Jackson in connection with the parties’ pending Joint Motion for a Protective Order filed on September 11, 2023 (Dkt No. 106).

Dated: November 13, 2023

Respectfully submitted,

/s/ J. Emmett Murphy

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